

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

KATHLEEN PAINE, as Guardian of the
Estate of CHRISTINA ROSE EILMAN,
a Disabled Person,

Plaintiff,

v.

OFFICER RICHARD CASON, et al.

Defendants.

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Case No. 06 C 3173

Judge Virginia M. Kendall

Magistrate Judge Valdez

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT RE: § 1983 CLAIMS**

Plaintiff, Kathleen Paine, as Guardian of the Estate of Christina Rose Eilman (“Plaintiff”), by her attorneys, Segal McCambridge Singer & Mahoney, Ltd., hereby responds in opposition to Defendants’ Motion for Summary Judgment. In support, Plaintiff states that there are genuine issues of material facts that warrant denial of the Defendants’ summary judgment with respect to Counts II, VI, X, XV, XVIII, XX, XXII, XXIV, XVI, XXVIII, XXXII and XXXIV.

Plaintiff incorporates the following documents with this response in opposition to Defendants’ Motion for Summary Judgment: Plaintiff’s Memorandum of Law filed in conjunction with this response; Plaintiff’s Local Rule 56.1(b)(3)(C) Statement of Additional Facts that Require Denial of the Defendants’ Motion for Summary Judgment; and Plaintiffs Response to Defendants’ Local Rule 56.1(a)(3) Statements of Undisputed Material Facts in Support of their Motion for Summary Judgment.

Respectfully submitted,

KATHLEEN PAINE, as Guardian of the Estate of
CHRISTINA ROSE EILMAN, a Disabled Person

By: /s/ Jeffrey Singer
One of Her Attorneys

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CERTIFICATE OF SERVICE

I, Jeffrey Singer, depose and state that I served a copy of the foregoing Plaintiff's Response in Opposition to Defendants' Motion for Summary Judgment Re: § 1983 Claims, upon the named parties listed below via ECF notification on the 16th day of November, 2009.

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By: /s/ Jeffrey Singer
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